



United States Attorney
Eastern District of Missouri

Organized Crime Drug Enforcement
Task Force - West Central Region

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March 3, 2010

All Counsel of Record

Re: United States v. Calvin Wallace, et al.
Cause No. 4:09CR00802 ERW-TIA

Dear Counsel:

As you are aware, your client is charged in a federal indictment with a violation of federal drug laws. The following is the government's disclosure of its discovery in this case. Please be aware of the following:

1. DISCOVERY - The government has enclosed all relevant material within the purview of Rule 16, Federal Rules of Criminal Procedure currently known by the government to exist. These materials include:

- Title III Documents (Bates Nos. WALLACE-0001-0856);
- Pen Registers & 2703 Orders (Bates Nos. WALLACE-0857-1089);
- Criminal History Reports, Reports of Investigation, Photographs (Bates Nos. WALLACE-1090-1648); and
- Title III Calls and Synopses (5 CDs and 2 DVDs)

and

The Government's Disclosure of Arguably Suppressible Evidence Pursuant to Federal Rule of Criminal Procedure 12(b)(4) has been filed.

Pursuant to Federal Rule of Criminal Procedure 12(b), these materials include descriptions of the evidence and statements the government plans to use at trial at this time.

In addition, I have discovery not included here that you may review in my office. Please contact me directly to arrange a time to do so.

As additional evidence is found, and as supplemental information comes to the government's attention, the government may choose not to use some evidence described, or to use evidence additional to that listed in these reports. If the government chooses to use additional evidence, a supplemental Rule 12(b) notice will be filed. With respect to discovery

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from the defense, the government has included a copy of its request for discovery which will be filed with the court.

2. **OTHER CRIMES EVIDENCE** - The government shall advise the defendant of its intention to use evidence of other crimes during its case-in-chief.

3. **STATEMENTS OF DEFENDANT** - The government has disclosed the existence of all statements made by the defendant to any law enforcement officials of which it is aware at this time. Additionally included is the government's motion for pretrial determination of the admissibility of these statements.

4. **PHYSICAL EVIDENCE** - The government does possess items of physical evidence which it intends to introduce into evidence at trial. You may personally inspect any evidentiary items at a mutually convenient time.

5. **FAVORABLE EVIDENCE** - The government would agree to furnish any and all favorable evidence to the defendant if and when its existence becomes known to the government.

If you need any further information regarding the above matters, or any other matters which will prevent the filing and litigation of any unnecessary pretrial motions, please do not hesitate to call me. Please contact me to make arrangements to view original photographs or other evidence, if you so choose.

Thank you in advance for your anticipated cooperation.

Very truly yours,

RICHARD G. CALLAHAN
United States Attorney

s/ Noelle C. Collins
Noelle C. Collins
Assistant United States Attorney

NCC/lma
Enclosures